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September 2, 2021

By ECF

Hon. Ona T. Wang
United States Magistrate Judge
United States Courthouse
500 Pearl Street
New York, New York 10007

Re: Jane Smith v. Annucci, et al.,
21-CV-01715 (RA)(OTW) [rel. 17-CV-07954 (RA)(OTW)]

Your Honor:

I write to respectfully request an extension of time, from September 3, 2021 until September 17, 2021, to file a proposed stipulation of confidentiality, as directed by the Court on August 20, 2021, with an undertaking that addresses the Court's February 24, 2021 and July 15, 2021 Orders on plaintiffs' motions for leave to proceed anonymously (ECF Nos. 1-5 & 84). The reason for the requested adjournment is because I need additional time to work with the New York State Department of Corrections and Community Supervision's Counsel's Office on the language for the undertaking. Counsel for plaintiffs have consented to this application.

Thank you.

Respectfully submitted,

/s/ Neil Shevlin
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cc: Counsel for plaintiffs (by ECF)